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June 17, 2019

By ECF Filing

Hon. Judge P. Kevin Castel
United States Courthouse – Courtroom 11D
500 Pearl Street
New York, New York 1007

Re: *Fasulo v. Xtrade Digital Assets, Inc.* (Case No. 19-cv-03741 (PKC))

Dear Judge Castel:

I am counsel for Defendants in the above-referenced action and write to update one item in the parties' joint letter to the Court dated June 13, 2019. On page 3, under the heading "Defendants' Contemplated Motions (Defendants' Statement)," in item number 3, Defendants express an intent to move for a protective order to stay discovery pending a decision on Defendants' contemplated motion to dismiss. Since filing the joint letter, the parties agreed to a proposed Case Management Plan that includes a stay of discovery, subject to Plaintiffs' right to move, pursuant to 15 U.S.C. §78u-4(b)(3)(B), to have the stay lifted on the ground that particularized discovery is necessary to preserve evidence or to prevent undue prejudice to Plaintiffs. Attached is a fully executed copy of the joint proposed Case Management Plan, a copy of which will also be submitted in writing to the Court at the initial pretrial conference, scheduled for June 18, 2019 at 11:45 a.m.

Respectfully,



Joel M. Taylor